



State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny
Secretary

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File Code: 4430

March 7, 1988

Ms. Laura Lodisio (5HS-12)
RCRA Enforcement
US EPA - Region V
230 S. Dearborn Street
Chicago, IL 60604

SUBJECT: Review of Revised Freeman Task I (dated 2/17/88)

Dear Ms. ^{Laura}Lodisio:

In response to Bill Muno's December 29, 1987 letter relaying our comments on the Freeman Task I submittal, Hatcher Inc. submitted the 2/17/88 addendum to address our concerns. We find that the submittal contains sufficient information that we hereby conditionally approve Task I subject to the following condition.

1) Additional information is required on the incinerator and wastepile. The discussion of other off-site investigations includes a description of an off-site incinerator and waste pile. Investigation of this site was accomplished through an EM study. An EM survey will not detect organic contamination. Freeman shall include: a map showing the location of the incinerator and wastepile, dates of operation, the types and quantities of materials handled in these areas, disposition of the wastepile, and a plan for soils investigation to determine if contamination has occurred.

It appears that the incinerator was once a part of the Freeman facility. According to Ted Bosch, he believes that Freeman had owned this property when the incinerator was operated. Since that time, Freeman has sold this property. Can you check with your legal council to make sure that the 3008(h) order still has jurisdiction over the incinerator and wastepile?

The Task I report summarizes Hatcher Inc. knowledge of cause and extent of the soil and groundwater contamination caused by Freeman. Based on this summary, it is clear that this knowledge is incomplete and the following items and work tasks are required as part of the Task 4 work.

1) Additional work is required to quantify the level of contaminants remaining on the church property. Spills from the Freeman property have contaminated the church property. Visibly contaminated (i.e. identified by dead vegetation) soil and soil from construction activities were removed. Limited data is

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available to quantify the shallow contamination remaining on the church property. Freeman shall propose a study to define the extent of this shallow contamination. This study shall investigate the contaminant levels in the upper three feet of soil using an 11.7 ev HNU and analytical testing (including method 624, 625 and HSL metal analyses).

2) The discussion of groundwater flow rate and direction makes the statement that prior to pumping well 30, deep groundwater was discharging to the Milwaukee River. This statement is still only conjecture. The 7 1/2 minute USGS map shows that the Milwaukee River elevation, east of the Freeman site, is about 745 feet. Observations taken in 1985 show that the dolomite water level elevation is also about 745 feet. This lack of gradient between the site and the river suggests that contaminants could move under the river.

The possibility of contaminants moving under the river is supported by the regional water level of the dolomite aquifer. The attached plot "Water Level from Dolomite Water Supply Wells" was developed from wells listed in table 2-6A of the 2/17/88 submittal. Wells were located by matching the well owners name to their property as shown in the 1976 Ozaukee County Plat Book. Water level elevation was determined by estimating the property elevation from a 7 1/2 minute USGS map and subtracting the static water depth. This plot shows a distinct eastward gradient that may carry Freeman contamination under the river.

To demonstrate that contamination cannot move under the river, Freeman shall contact private well owners in the 1/2 W Sec. 31 T11N R21E to determine if water level elevations can be taken at their wells. Comparing these elevations to the river elevation will show if the river is intercepting the contamination.

If Freeman is not able to find a suitable private well, Freeman shall propose the construction of additional well(s) in the 1/2 W Sec. 31.

Our comments to Freeman should include a reminder that a more careful reporting of spills will be required in the future. The spill history submitted as part of the Task I revisions seems a bit thin. I would expect that a facility of this size would have more frequent small spills. Under Spill Law, (s. 144.76, Stats.) Freeman is required to report spills of hazardous substances. Conditions 22 and 25 of the Department's February 9, 1988 Approval of Freeman's Plan of Operation spell out these requirements. These requirements state that spills must be reported if:

- 1) any hazardous waste or hazardous substance is spilled outside of a secondary containment structure,
- 2) any hazardous substance spill of greater than 10 gallons in a secondary containment structure, or

3) any hazardous waste spill of greater than 1 gallon in a secondary containment structure.

We recognize that transfer operations often result in the release of materials. The intent of these conditions is not to require reporting of releases contained by drip tanks or pails.

Please let me know if you want any help incorporating these comments into a letter to Freeman.

Sincerely,



Mark Tusler, Hydrogeologist
Hazardous Waste Management Section
Bureau of Solid and Hazardous Waste

cc: Kevin Brunner - Village of Saukville
Ted Bosch/Frank Schultz/Gregg Pilarski/Jeff Bode SED
Lee Bouchon - WS/2

Water Level from Dolomite Water Supply Wells

